

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) CRIMINAL NO. 19-CR-10420-NMG
)
v.)
)
KATHLEEN NOFTLE)

MOTION TO MODIFY CONDITIONS OF
RELEASE TO PERMIT OUT OF STATE TRAVEL

Now comes the Defendant, Kathleen Nofle, by her attorney, and hereby requests that this Honorable Court modify the conditions of release and permit her to travel to Florida.

Ms. Nofle was released on conditions by this Court on September 18, 2019. One of those conditions included that her travel be restricted to the New England States.

Ms. Nofle is seeking permission to travel to Florida for a family vacation during the first week of March.

Defense Counsel has conferred with the Probation Department and the Government. The Government does not object to this request. The Probation Department reports that Ms. Nofle is in compliance with the requirements of her supervision. We request that the Probation Department be authorized to coordinate the exact timing of the trip, including when she departs, where she stays, and when she returns, directly with Ms. Nofle.

KATHLEEN NOFTLE
By her attorney

/s/ Jessica P. Thrall
Jessica P. Thrall
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CERTIFICATE OF SERVICE

I, Jessica P. Thrall, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on January 8, 2020.

/s/ Jessica P. Thrall

Jessica P. Thrall